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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

NORTHERN ALASKA ENVIRONMENTAL
CENTER, *et al.*,

Plaintiffs,

v.

SCOTT DE LA VEGA, in his official capacity
as Acting Secretary of the U.S. Department of
the Interior, *et al.*,¹

Defendants,

and

AMBLER METALS, LLC, *et al.*,

Intervenor-Defendants.

Case No. 3:20-cv-00187-SLG

¹ Pursuant to FED. R. CIV. P. Rule 25(d), Scott de la Vega, in his official capacity as Acting Secretary of the Interior, is automatically substituted for David Bernhardt.

UNOPPOSED MOTION SEEKING EXTENSION OF SCHEDULE

Defendants Scott de la Vega, *et al.*, request entry of an order extending the current schedule addressing the administrative record in the above-captioned case, as set forth below. Plaintiffs have indicated this case is related to *Alatna Village Council et al. v. Padgett et al.*, Civil Case No. 3:20-cv-00253-SLG, but do not seek to consolidate the cases. ECF 15. However, the current schedules are the same for both cases, and the same extension requested herein will be submitted in a similar motion in the related case.

In compliance with the existing schedule (ECF 28), Defendants on January 15, 2021, filed and served the initial production of the administrative records of the Bureau of Land Management and National Park Service. Defendants need additional time beyond the existing deadline of February 19, 2021, to complete the additional production of administrative records. The current database includes a large volume of documents, including native format e-mails harvested from multiple agency personnel. Under applicable law and guidance, it will require significant time by agency personnel to review and code these documents in order to determine which of them to include in the additional production. The agency is addressing these tasks during a period of unique workload volume and complexity for Department of the Interior matters in Alaska, which have taxed resources in the Defendant bureaus and agencies, including agency counsel.

Undersigned counsel has conferred with counsel for the other parties. Plaintiffs do not oppose the motion. Intervenor-Defendants Ambler Metals LLC and Alaska Industrial Development and Export Authority do not oppose the motion, while the State of Alaska

takes no position on the motion.

Accordingly, Defendants request that the schedule in this case be modified as follows:

1. Defendants will file and serve the additional production of the administrative records in accordance with Local Civil Rule 16.3(b)(1)(B) on or before **April 20, 2021**.
2. Any party contesting the sufficiency of the administrative record will identify their concerns and confer with counsel for Defendants on or before **May 20, 2021**.
3. The deadline for filing any motion to supplement the administrative record shall be **June 21, 2021**.
4. If a motion is filed in accordance with paragraph 3 above, the deadline for any response to the motion shall be 30 days after service of the motion, and the deadline for any reply shall be 14 days after service of any responses.
5. Any party may seek a further extension of time if necessary to review the administrative record and attempt to resolve any issues without contested motions.
6. If no motion is filed in accordance with paragraph 3 above, Counsel will submit a joint motion or status report(s) on or before **June 28, 2021**, proposing a schedule for briefing or further proceedings.

DATED: February 16, 2021.

JEAN E. WILLIAMS
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/s/ Sarah A. Buckley

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CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2021, a copy of the foregoing was served by electronic means on all counsel of record by the Court's CM/ECF system.

/s/ Paul A. Turcke

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